

UNITED STATES DISTRICT COURT
for the
Southern District of Ohio

United States of America)
v.)
Alberto Caiceros-Cruz) Case No. 2:25-mj-92
)
)
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

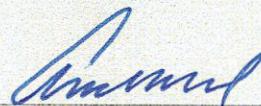
On or about the date(s) of February 21, 2025 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
8 USC 1326(a)	Illegal Re-Entry

This criminal complaint is based on these facts:

see attached affidavit

Continued on the attached sheet.



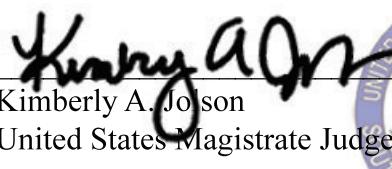
Complainant's signature

Andrew H. Wend, Deportation Officer
Printed name and title

Sworn to before me and signed in my presence.

Date: 02/21/2025

City and state: Columbus, OH


Kimberly A. Johnson
United States Magistrate Judge



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE MATTER OF THE
CRIMINAL COMPLAINT OF:

ALBERTO CAICEROS-CRUZ

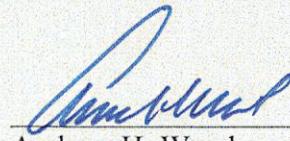
CASE NO. 2:25-mj-92

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, United States Immigration and Customs Enforcement Deportation Officer Andrew H. Wend, being first duly sworn, depose and state as follows:

1. I am a Deportation Officer with the United States Department of Homeland Security, Immigration and Customs Enforcement (ICE). I have been employed with ICE since 2015. Prior to that, I was employed as a Border Patrol Agent with the United States Border Patrol, successfully completing the Border Patrol Academy course at the Federal Law Enforcement Training Center (FLETC) at Artesia, New Mexico in 2009. I am currently assigned to the Westerville, Ohio office of the Detroit Field Office. I have a combined fifteen years of training and experience in the enforcement of immigration and naturalization laws of the United States. As a part of my duties, I identify, locate, apprehend, and remove aliens who are in violation of the Immigration and Nationality Act. I have investigated both criminal and administrative matters involving Titles 8 and 18 of the United States Code, including illegal reentry into the United States, false claim to United States citizenship, and the fraudulent production, possession, and use of identity documents.
2. During the course of investigating Alberto CAICEROS-CRUZ, I have learned the following facts:
3. CAICEROS-CRUZ is a citizen of Mexico and has no legal status in the United States.
4. On or about June 7, 2013, ICE Enforcement and Removal (ERO) officers encountered CAICEROS-CRUZ at the Franklin County Jail in Columbus, Ohio. ICE officers issued CAICEROS-CRUZ a Notice to Appear, Form I-862 charging removability pursuant to INA section 212(a)(6)(A)(i) and issued Alien Registration Number 205 785 966.

5. On or about June 11, 2013, an Immigration Judge in Cleveland, Ohio ordered CAICEROS-CRUZ removed to Mexico. On or about June 19, 2013, ICE ERO removed CAICERSO-CRUZ to Mexico through the Laredo, Texas Port of Entry. Prior to removal, CAICEROS-CRUZ surrendered his fingerprint and photo for Immigration Form I-205 (Warrant of Removal/Deportation), a document that he signed. CAICEROS-CRUZ's removal was witnessed by an Immigration Officer.
6. On or about December 13, 2020, ICE ERO officers encountered CAICEROS-CRUZ in Columbus, Ohio. ICE ERO charged CAICEROS-CRUZ administratively for reinstatement of a prior order of removal as described in Section 241(a)(5) of the Immigration and Nationality Act. On or about December 20, 2022, CAICEROS-CRUZ was physically removed from the United States to Mexico via the Brownsville, Texas Port of Entry. Prior to removal, CAICEROS-CRUZ surrendered his fingerprint and photo for Immigration Form I-205 (Warrant of Removal/Deportation), a document that he signed. CAICEROS-CRUZ's removal was witnessed by an Immigration Officer.
7. On or about February 21, 2025, at approximately 7:30 AM, members of the Homeland Security Task Force observed CAICEROS-CRUZ exit his residence located at 322. S. Harris Avenue, Columbus, Ohio 43229 and enter the passenger side of a white Ford Escape. Homeland Security Task Force members followed the vehicle to the Miller Kelton exit of I-70 where a vehicle stop was conducted by the Columbus Division of Police due to failure to display registration. An ICE Officer assigned to the Homeland Security Taks Force positively identified the passenger as Alberto CAICEROS-CRUZ, an alien having been previously encountered by ICE and removed from the United States. CAICEROS-CRUZ was then placed under arrest.
8. After verification of fingerprints, ICE determined that CAICEROS-CRUZ had previously been ordered removed from the United States and is subject to prosecution for illegal reentry. Biometric and records checks confirmed that CAICEROS-CRUZ has not requested, applied to, or received permission from, the Attorney General of the United States or the Secretary of the Department of Homeland Security to re-enter the United States after being deported, excluded, or removed.
12. Your Affiant submits that the facts summarized above establish probable cause that Alberto CAICEROS-CRUZ, an alien, was found in the Southern District of Ohio, after having been removed from the United States on or about the above dates, and not having obtained the express consent of the Attorney General or the Secretary of the Department of Homeland Security to reapply for admission to the United States, in violation of 8 U.S.C. § 1326(a).



Andrew H. Wend
Deportation Officer
Immigration and Customs Enforcement

Sworn before me and subscribed in my presence on this 21st day of February 2025.



Kimberly A. Jolson
United States Magistrate Judge

